

**IN THE UNITED STATES DISTRICT COURT
FOR WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

DR. ROBERT W. MALONE

Plaintiff

v.

Case Number: 3:22-cv-63

**PETER R. BREGGIN, MD.
GINGER ROSS BREGGIN,
AMERICA OUT LOUD,
DR. JANE RUBY**

And

RED VOICE MEDIA

Defendants.

**MOTION TO DISMISS AMENDED COMPLAINT FOR LACK OF PERSONAL
JURISDICTION PURSUANT TO RULE 12(b)(2) OF THE FEDERAL RULES OF
CIVIL PROCEDURE**

Pursuant to Federal Rule of Civil Procedure 12(b)(2), Defendants Peter R. Breggin, MD. And Ginger Ross Breggin, by counsel, move this Court to dismiss the Amended Complaint filed by Dr. Robert W. Malone, (the "Plaintiff") for lack of personal jurisdiction over Dr. and Mrs. Breggin. The grounds and reasons for granting this relief are stated in the accompanying Memorandum which is filed contemporaneously herewith and incorporated herein.

Respectfully Submitted,

PETER R. BREGGIN, MD.
GINGER ROSS BREGGIN
By Counsel

By: /s/ William M. Stanley
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CERTIFICATE

I hereby certify that on the 13th day of July, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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